

1
2
3
4
5
6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 UNITED STATES OF AMERICA,)
9)
10 Plaintiff,)
11 v.) 2:04-CR-177-GMN-(PAL)
12 FLORIN IANCU, and,)
13 ROUBEN KIRAKOSSIAN,)
Defendants.)

14 **AMENDED FINAL ORDER OF FORFEITURE**

15 On April 20, 2011, the United States District Court for the District of Nevada entered a
16 Preliminary Order of Forfeiture pursuant to Fed. R. Crim. P. 32.2(b)(1) and (2); Title 18, United States
17 Code, Section 1963(a)(3); and Title 21, United States Code, Section 853(p) based upon the plea of
18 guilty by defendant FLORIN IANCU to the criminal offense, forfeiting the property set forth in the
19 Plea Memorandum and the Forfeiture Allegations of the Second Superseding Criminal Indictment and
20 shown by the United States to have the requisite nexus to the offense to which defendant FLORIN
21 IANCU pled guilty. Second Superseding Criminal Indictment, ECF No. 267; Plea Memorandum, ECF
22 No. 293; Change of Plea, ECF No. 294; Preliminary Order of Forfeiture, ECF No. 296; Final Order of
23 Forfeiture, ECF No. 304.

24 On January 8, 2013, the United States District Court for the District of Nevada entered a
25 Preliminary Order of Forfeiture pursuant to Fed. R. Crim. P. 32.2(b)(1) and (2); Title 18, United States
26 Code, Section 1963(a)(3); and Title 21, United States Code, Section 853(p) based upon the plea of

1 guilty by defendant ROUBEN KIRAKOSSIAN to the criminal offense, forfeiting the property set
2 forth in the Plea Agreement, and the Forfeiture Allegations of the Second Superseding Criminal
3 Indictment and shown by the United States to have the requisite nexus to the offense to which
4 defendant ROUBEN KIRAKOSSIAN pled guilty. Second Superseding Criminal Indictment, ECF No.
5 267; Change of Plea, ECF No. 333; Preliminary Order of Forfeiture, ECF No. 334; Plea Agreement,
6 ECF No. 335; Final Order of Forfeiture, ECF No. 352.

7 This Court finds the United States of America published the notice of forfeiture in accordance
8 with the law via the official government internet forfeiture site, www.forfeiture.gov, consecutively
9 from November 19, 2013, through December 18, 2013, notifying all potential third parties and notified
10 known third parties by personal service or by regular mail and certified mail return receipt requested,
11 of their right to petition the Court. Notice of Filing Proof of Publication, ECF Nos. 356 and 357.
12 Notice of Filing Service of Process, ECF Nos. 358, 358-1, 358-2, 358-3, and 358-4.

13 On November 14, 2013, Citigroup Inc. c/o CEO Michael Corbat, was served by regular mail
14 and certified return receipt mail with the Notice and Preliminary Orders of Forfeiture. Notice of Filing
15 Service of Process – Mailing, ECF No. 358, p. 5-9 and ECF No. 384-4 p. 6-18.

16 On November 14, 2013, C T Corporation System, Registered Agent for Citicorp Inc., was
17 served by regular mail and certified return receipt mail with the Notice and Preliminary Orders of
18 Forfeiture. Notice of Filing Service of Process – Mailing, ECF No. 358, p. 10-14 and ECF No. 384-4
19 p. 6-18.

20 On November 22, 2013, C T Corporation System sent a letter to the U.S. Attorney's Office in
21 Las Vegas stating they were not the Registered Agent for Citicorp Inc. in the state of New York.

22 On January 7, 2014, C T Corporation System, Registered Agent for Citigroup Inc., was served
23 by regular mail and certified return receipt mail with the Notice and Preliminary Orders of Forfeiture.
24 Notice of Filing Service of Process – Mailing, ECF No. 358, p. 15-20 and ECF No. 384-4 p. 6-18.

25 . . .

26 . . .

1 On November 14, 2013, US Bancorp c/o CEO Richard K. Davis, was served by regular mail
2 and certified return receipt mail with the Notice and Preliminary Orders of Forfeiture. Notice of Filing
3 Service of Process – Mailing, ECF No. 358-1, p. 1-5 and ECF No. 384-4 p. 6-18.

4 On November 14, 2013, C T Corporation System Inc., Registered Agent for US Bancorp, was
5 served by regular mail and certified return receipt mail with the Notice and Preliminary Orders of
6 Forfeiture. Notice of Filing Service of Process – Mailing, ECF No. 358-1, p. 6-10 and ECF No. 384-4
7 p. 6-18.

8 On November 14, 2013, Discover Financial Services (Inc.) c/o President Roger Hochschild,
9 was served by regular mail and certified return receipt mail with the Notice and Preliminary Orders of
10 Forfeiture. Notice of Filing Service of Process – Mailing, ECF No. 358-1, p. 11-15 and ECF No. 384-4
11 p. 6-18.

12 On November 14, 2013, C T Corporation System, Registered Agent for Discover Financial
13 Services (Inc.), was served by regular mail and certified return receipt mail with the Notice and
14 Preliminary Orders of Forfeiture. Notice of Filing Service of Process – Mailing, ECF No. 358-1, p. 16-
15 20 and ECF No. 384-4 p. 6-18.

16 On November 14, 2013, People's United Financial, Inc. c/o President Jack Barnes, was served
17 by regular mail and certified return receipt mail with the Notice and Preliminary Orders of Forfeiture.
18 Notice of Filing Service of Process – Mailing, ECF No. 358-2, p. 1-5 and ECF No. 384-4 p. 6-18.

19 On November 14, 2013, Susan D. Stanley, Registered Agent for People's United Financial,
20 Inc., was served by regular mail and certified return receipt mail with the Notice and Preliminary
21 Orders of Forfeiture. Notice of Filing Service of Process – Mailing, ECF No. 358-2, p. 6-10 and ECF
22 No. 384-4 p. 6-18.

23 On November 14, 2013, Community America Credit Union c/o CEO Dennis Pierce, was
24 served by regular mail and certified return receipt mail with the Notice and Preliminary Orders of
25 Forfeiture. Notice of Filing Service of Process – Mailing, ECF No. 358-2, p. 11-15 and ECF No. 384-4
26 p. 6-18.

1 On November 14, 2013, Commerce Bank c/o President John W. Kemper, was served by
2 regular mail and certified return receipt mail with the Notice and Preliminary Orders of Forfeiture.
3 Notice of Filing Service of Process – Mailing, ECF No. 358-2, p. 16-20 and ECF No. 384-4 p. 6-18.

4 On November 14, 2013, (Regulated by the Division of Finance), Registered Agent for
5 Commerce Bank, was served by regular mail and certified return receipt mail with the Notice and
6 Preliminary Orders of Forfeiture. Notice of Filing Service of Process – Mailing, ECF No. 358-3, p. 1-5
7 and ECF No. 384-4 p. 6-18.

8 On November 14, 2013, HSBC Card Services c/o President Patrick Burke, was served by
9 regular mail and certified return receipt mail with the Notice and Preliminary Orders of Forfeiture.
10 Notice of Filing Service of Process – Mailing, ECF No. 358-3, p. 6-10 and ECF No. 384-4 p. 6-18.

11 On November 14, 2013, The Corporation Trust Company of Nevada, Registered Agent for
12 HSBC Card Services, Inc. was served by regular mail and certified return receipt mail with the Notice
13 and Preliminary Orders of Forfeiture. Notice of Filing Service of Process – Mailing, ECF No. 358-3,
14 p. 11-15 and ECF No. 384-4 p. 6-18.

15 On November 14, 2013, General Electric Company c/o President Jeffrey R. Immelt, was
16 served by regular mail and certified return receipt mail with the Notice and Preliminary Orders of
17 Forfeiture. Notice of Filing Service of Process – Mailing, ECF No. 358-3, p. 16-20 and ECF No. 384-4
18 p. 6-18.

19 On November 14, 2013, The Corporation Trust Company of Nevada, Registered Agent for
20 General Electric Company, was served by regular mail and certified return receipt mail with the
21 Notice and Preliminary Orders of Forfeiture. Notice of Filing Service of Process – Mailing, ECF No.
22 358-4, p. 1-18.

23 This Court finds no petition was filed herein by or on behalf of any person or entity and the
24 time for filing such petitions and claims has expired.

25 This Court finds no petitions are pending with regard to the assets named herein and the time
26 for presenting such petitions has expired.

1 THEREFORE, IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that all right,
2 title, and interest in the property hereinafter described is condemned, forfeited, and vested in the
3 United States of America pursuant to Fed. R. Crim. P. 32.2(b)(4)(A) and (B); Fed. R. Crim. P.
4 32.2(c)(2); Title 18, United States Code, Section 1963(a)(3); and Title 21, United States Code, Section
5 853(n)(7) and (p) and shall be disposed of according to law:

- 6 (1) Sony Vaio Desk Top computer (serial number: 284711373004449);
- 7 (2) Compaq Presario laptop computer (serial number: 6D22JCH371W9);
- 8 (3) Hewlett Packard laptop computer (serial number: TW13920335);
- 9 (4) Valiant 671DP laptop computer (serial number: T0140E300850);
- 10 (5) automated teller machine (AATM@);
- 11 (6) Toshiba laptop computer (serial number: 2304502PU);
- 12 (7) HP Pavilion 753N (serial number: MX23605319);
- 13 (8) Panasonic Palmcorder mini-dv camera, model PV-DV (serial number:
14 BN07131008488);
- 15 (9) HP Office Jet printer (serial number: MY16CB-21YP);
- 16 (10) VEO Stingray video camera (serial number: 330VB2AX000-771);
- 17 (11) Olympus digital camera (serial number: 237238802);
- 18 (12) Compaq Contura laptop computer (serial number: 7529HPB23352);
- 19 (13) Sony Vaio laptop computer (serial number: 283216303205876);
- 20 (14) HP laptop computer (serial number: TW21618644);
- 21 (15) Quantum Hard drive (serial number: 652028547895PGZXX);
- 22 (16) Sony MVC-CD 300 digital camera (serial number: 341794);
- 23 (17) JVC digital video camera DVM-90 (serial number: 09660914);
- 24 (18) Sony Digital Photo Printer DPP-EX5 (serial number: 312788);
- 25 (19) Brother LX-900 Printer (serial number: US 2543-MOJ35);
- 26 (20) Sony LCD Monitor (serial number: 0424888);

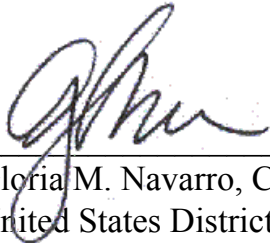
1 (21) Sharp Display Monitor (serial number: 203418267); and

2 (22) an *in personam* criminal forfeiture money judgment of \$1,000,000.00 in United States
3 Currency.

4 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that any and all forfeited funds,
5 including but not limited to, currency, currency equivalents, certificates of deposit, as well as any
6 income derived as a result of the United States of America's management of any property forfeited
7 herein, and the proceeds from the sale of any forfeited property shall be disposed of according to law.

8 The Clerk is hereby directed to send copies of this Order to all counsel of record and three
9 certified copies to the United States Attorney's Office.

10 **DATED** this 25th day of February, 2014.

11
12 
13 _____
14 Gloria M. Navarro, Chief Judge
15 United States District Court
16
17
18
19
20
21
22
23
24
25
26

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26

CM/ECF

Charles E. Kelly
Charles E. Kelly & Associates
706 S. Eighth
Las Vegas, NV 89101
cekly@aol.com
Attorney for Eduard Andronesco

John T. Moran, III
Moran Law Firm
630 S. 4th St.
Las Vegas, NV 89101
Jt3.moran@moranlawfirm.com
Attorney for Nana Ochershvilli

1 Michael I Gowdey
2 Law Offices of Michael I Gowdey
3 Law Offices of Michael I Gowdey
4 815 S. Casino Center Blvd.
5 Las Vegas, NV 89101
6 mgowdey@aol.com
7 Attorney for Marian Iancu

Travis E. Shetler
Travis E. Shetler, P.C.
844 E. Sahara Ave.
Las Vegas, NV 89104
travisssetler@gmail.com
Attorney for Petros Kekedian

8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

/s/ Ray Southwick
Ray Southwick
Forfeiture Support Associates Paralegal